UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

In re:	)
	)
HAWKER PACIFIC AEROSPACE,	)
San Fernando Valley/North Hollywood	)
Superfund Site	)
North Hollywood, California	)

INTERIM RESPONSE OF HAWKER PACIFIC AEROSPACE TO 104(e) INFORMATION REQUEST DATED MARCH 28, 2006

This Interim Response of Hawker Pacific Aerospace ("Hawker") submits this Interim Response to the Request for Information dated March 28, 2006 issued by the United States Environmental Protection Agency ("EPA") ("the Request") pursuant to an Agreement dated April 13, 2006 between Hawker and EPA. The parties agreed that Hawker will respond to 10 requests of its choosing by May 9, 2006. This Interim Response responds to 16 of the Requests. The remainder of the responses are to be submitted on or before June 2, 2006.

Hawker generally objects to the Request and unduly burdensome, overbroad and beyond the scope of EPA's authority. EPA has issued numerous prior requests to Hawker pursuant to CERCLA Section 104(e) relating to the same matter and seeking virtually the same information, and each such request was fully and completely responded to by Hawker. For example, Hawker fully responded to a 104(e) request issued by EPA on July 7, 1989. Hawker likewise responded to a 104(e) request on June 14, 1991. Hawker also responded to a 104(e) request on June 24, 1992. As part of its responses to these prior requests, Hawker produced many documents. The Request is, in large part, duplicative of these prior requests and seeks information previously provided to EPA. Hawker hereby incorporates its prior objections, claims of confidentiality and responses to the prior requests in its Response to this Request. This Response does not constitute any admission by Hawker that it has contributed to or is responsible for the San Fernando Valley groundwater

contamination referenced in the Request, and Hawker specifically denies any such contribution or responsibility.

Hawker further objects to the Instructions, including but not limited to Instructions 6 and 7 as beyond the scope of EPA's authority.

Without waiving the foregoing, Hawker further responds as follows:

Request No. 1:

State the full legal name, address, telephone number, position(s) held by, and tenure of the individual(s) answering any of the questions below on behalf of Hawker Pacific Aerospace (the "Company").

RESPONSE:

Erik Krapf Johnson
FX-6: Personal Privacy

Employment Date:	March 21, 1988
Current Position:	Environmental Health and Safety Specialist – 1.5 years
Previous Positions:	Hazardous Waste Supervisor – 17 years Maintenance Supervisor – 4 years Plating Supervisor – 2 years

Request No. 2:

Identify the individuals who are or were responsible for environmental matters at the Company's facility located at 11310 Sherman Way, Sun Valley, California (the "Facility"). Henceforth, the term "Facility" shall be interpreted to include both the real property at 11310 Sherman Way, Sun Valley, California, and any improvements thereto. For each individual responsible for environmental matters, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates each individual held such position.

RESPONSE:

Erik Krapf Johnson
FX-6: Personal Privacy

Employment Date: March 21, 1988

Current Position: Environmental Health and Safety Specialist – 1.5 years

Previous Positions: Hazardous Waste Supervisor – 17 years
Maintenance Supervisor – 4 years
Plating Supervisor – 2 years

Further information was provided to EPA in response to prior requests.

Request No. 3:

Explain the Company's present operational status (e.g., active, suspended, defunct, merged, or dissolved).

RESPONSE: The operation status is active.

Request No. 4:

Provide the date the Company was incorporated, formed, or organized. Identify the State in which the Company was incorporated, formed, or organized.

RESPONSE: Hawker was incorporated in August 1980 as a California corporation. It purchased certain assets located at, and began operating, the Sherman Way facility in 1987.

Request No. 5:

Identify the business structure (e.g., sole proprietorship, general partnership, limited partnership, joint venture, or corporation) under which the Company currently exists or operates and identify all former business structures under which it existed or operated since its inception.

RESPONSE: Hawker is a California corporation. Since 1987 the same corporation has operated the Sherman Way facility. The operational history of the facility has been previously described in the prior responses. Hawker did not operate the Sherman Way facility under other business structures.

Request No. 6:

For each business structure under which the Company has existed or operated at the Facility since its inception, provide the corresponding dates that it existed or operated under that business structure, the name(s) it used, and the Facility addresses at which it operated or was otherwise located.

RESPONSE: See, Response to Request No. 5 above.

Request No. 7:

Provide a copy of the articles of incorporation, partnership agreement, articles of organization, or any other documentation (together with any amendments) demonstrating the particular business structure under which the Company has existed or operated since its inception.

RESPONSE: The articles of incorporation were previously provided to EPA in response to a prior request.

Request No. 8:

If the Company is or was operating under a fictitious business name, identify the fictitious name and the owner(s) of the fictitious name, and provide a copy of the Fictitious Business Name Statement filed with the county in which the Company is or was doing business.

RESPONSE:

Request No. 9:

Identify and explain any and all sales of the Company's assets if the sale represented a sale of substantially all of the Company's assets.

RESPONSE:

Request No. 10:

Identify and explain any investments by the Company in other businesses, companies, or corporations equating to 5% or more of that other business, company, or corporation from the formation of the Company to the present.

RESPONSE:

Request No. 11:

List the names, titles, telephone number(s), and current or last known addresses of all individuals who are currently or were officers and/or owners of the Company during any time that the Company was operating at the Facility, regardless of the business structure under which the Company is or was operated. Provide documentation of both the percentage of each individual's current or former ownership interest in the Company and the time period(s) during which he/she held this ownership interest.

RESPONSE:

Request No. 12:

Identify the dates the Company, under any of its current or former business structures, owned the Facility. Provide a copy of the title documentation evidencing the Company's ownership of the Facility.

RESPONSE:

Request No. 13:

For any period of time in which the Company, under any of its current or former business structures, owned the Facility, provide the name, address, and phone number of any tenant or lessee. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to any other operators at the Facility.

RESPONSE:

Request No. 14:

Provide the dates that the Company, under any of its current or former business structures, operated at the Facility.

RESPONSE:

Request No. 15:

For any period of time in which the Company, under any of its current or former business structures, operated at, but did not own, the Facility, provide the name, address, and phone number of the Facility's owner. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to the real property owner during the Company's occupancy of the Facility.

RESPONSE:

Request No. 16:

Identify any individual or entity that owned or operated the Facility prior to the Company. For each prior owner or operator, further identify:

a. The dates of ownership/operation;
b. The nature of prior operations at the Facility;
c. All evidence showing that the prior owner or operator controlled access to the property; and
d. All evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at the Facility during the period of prior ownership or operation.

RESPONSE: This information was provided to EPA by Hawker in response to a prior request.

Request No. 17:

Provide a complete list of employees who had knowledge of the use of hazardous substances and disposal of wastes at the Facility during any or all of the period of time that the Company operated at or was otherwise associated with the Facility. For each employee listed, provide the following information:

a. The employee's full name;
b. The employee's current or last known address and telephone number, including the last known date on which you believe each address and telephone was current;
c. The dates that the employee worked at the Facility;
d. The position(s) the employee held under any of the Company's business structures; and
e. The employee's job title(s) and the corresponding dates during which the Company believes that the employee would have had knowledge of the use and disposal of wastes.

RESPONSE:

Request No. 18:

Describe the size of the Facility, the approximate number of people employed by the Company, and the product(s) manufactured or services performed by the Company. Describe any significant change in Facility size, the number of employees, or the products manufactured over time.

RESPONSE:

Request No. 19:

Documentation supplied to EPA shows a clarifier located inside the building where plating operations were conducted which was connected to the city sewer line, and which was capped and cemented in 1994. With regard to this former clarifier, explain the reasons for and circumstances surrounding the closure of the clarifier and provide copies of all documentation relating to its closure.

RESPONSE: This clarifier system was installed in approximately 1968 when the plating shop was constructed. The clarifier system consists of five pits or compartments. The approximate size of each of these compartments is 5 feet deep, 5 feet 6 inches long, 3 feet 6 inches wide. The purpose of this clarifier system was to pre-treat the rinse waters from the plating operation before discharging to the Industrial Sewer System. See, Ex. 1, hereto, Copy of Drawing for Stellar Hydraulics dated 02-14-68; Drawn by H.C. Wells; Labeled D-1.

The clarifier system was closed in 1994. The sampling sump was filled with concrete to prevent a discharge to Publicly Owned Treatment Works. Hawker purchased a vacuum distillation system to replace an ion exchange system for treating the plating shop rinse waters. The purchase of the vacuum distillation system would allow the facility to recycle and reuse a large percentage of the plating shop rinse waters previously discharged into the industrial sewer system. See, Ex. 2, hereto, Copy of Los Angeles City, Department of Building and Safety, Application for Plumbing Inspection and Plan; Ex. 3, hereto, Copy of letter from Michael S. Homer, Chief, onsite Hazardous Waste Treatment Unit, dated 01-31-95.

Request No. 20:

Provide a scaled map of the Facility which includes the locations or significant buildings and features. Indicate the locations of any maintenance shops, machine shops, degreasers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a physical description of the Facility and identify the following:

a. Surface structures (e.g., buildings, tanks, containment and/or storage areas, etc.);
b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers, etc.);

c. Groundwater and dry wells, including drilling logs, date(s) of construction or completion, details of construction, uses of the well(s), date(s) the well(s) was/were abandoned, depth to groundwater, depth of well(s) and depth to and of screened interval(s);
d. Past and present stormwater drainage system and sanitary sewer system, including septic tank(s) and subsurface disposal field(s);
e. Any and all additions, demolitions or changes of any kind to physical structures on, under or about the Facility or to the property itself (e.g., excavation work), and state the date(s) on which such changes occurred; and
f. The location of all waste storage or waste accumulation areas as well as waste disposal areas, including but not limited to dumps, leach fields, and burn pits.

RESPONSE:

Request No. 21:

Correspondence obtained by EPA indicates that two private septic systems are located at the Facility. Please indicate the location of these septic systems on the map provided in response to Question 20. State whether any hazardous substances or wastes are (or were) disposed of through these systems and if so, identify each hazardous substance, the time periods during which the disposal occurred, and the quantity of each waste disposed. Provide copies of all permits granted and analyses performed relating to disposals through the septic systems.

RESPONSE: Septic tanks are located in buildings # 3 and # 4. The private sewage disposal system connected to building # 3 consists of two concrete holding pits and one brick lined seepage pit. The private sewage disposal systems connected to building # 4 consists of one concrete holding pits and one brick lined seepage pit. See, Ex. 4, hereto, Copy of Law Environmental Report dated 08-10-89, Section-Findings, pages 7 and 8. No permits have been located for the private sewage disposal systems. These private sewage disposal systems were and are used for the disposal of materials that would normally be discharged in to a sanitary sewer system, restroom wastes only. Hawker has no knowledge of disposal of hazardous waste to the septic system.

Request No. 22:

Provide copies of hazardous material business plans and chemical inventory forms (originals and updates) submitted to city, county, and state agencies.

RESPONSE: Hazardous materials business plans and chemical inventory.

Enclosed are the following: Ex. 5, Disclosure Report 1986; Ex. 6, Disclosure Inventory Form for 1988; Ex. 7, Los Angeles City Fire Department Computer Listing of Inventory submitted 1994; Ex. 8, Annual Inventory Update 2001 from Los Angeles City Fire Department; and Ex. 9, Business Plan and Inventory Forms submitted to Los Angeles City Fire Department in 1998.

Request No. 23:

Provide a list of all chemicals and hazardous substances used at the Facility, identifying the chemical composition and quantities used. Provide copies of Material Safety Data Sheets for all hazardous substances used.

RESPONSE:

Request No. 24:

Identify and provide the information below for all volatile organic compounds (most notably PCE; TCE; 1,1-DCE; MTBE; 14-DCA, cis-1,2-DCE; and carbon tetrachloride); Title 22 metals including total and hexavalent chromium; 1,4-dioxane; N-nitrosodymethylamine (NDMA); perchlorate; which are or were used at, or transported to, the Facility:

a. The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance and the Material Safety Data Sheet for each product;
b. The location(s) where each chemical or hazardous substance is or was used, stored, and disposed of;
c. The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance;
d. The quantity purchased (in gallons), the time period during which it was used, and the identity of all persons who used it; and
e. The supplier(s), and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks, or any other documents pertaining to the supply of chemicals or hazardous substances.

RESPONSE:

Request No. 25:

Provide copies of all environmental data or technical or analytical information regarding soil, water, and air conditions at or adjacent to the Facility, including, but not limited to, environmental data or technical or analytical information related to soil contamination, soil sampling, soil gas sampling, geology, water (ground and surface), hydrogeology, groundwater sampling, and air quality.

RESPONSE:

Request No. 26:

Identify, and provide the following information for, all groundwater wells that are located at the Facility:

a. A map with the specific locations of the Facility groundwater wells;
b. Date the Facility groundwater wells were last sampled;
c. List of all constituents which were analyzed during groundwater sampling events; and
d. All groundwater sampling results, reports of findings, and analytical data.

RESPONSE:

Request No. 27:

Identify all insurance policies held by the Company from the time it commenced ownership of or operations at the Facility until the present. Provide the name and address of each insurer, the policy number, the amount of coverage and policy limits, the type of policy, and the expiration date of each policy. Include all comprehensive general liability policies and "first party" property insurance policies and all environmental impairment insurance. Provide a complete copy of each policy.

RESPONSE:

Request No. 28:

Provide copies of any applications for permits or permits received under any local, state, or federal environmental laws and regulations, including any waste discharge permits, such as national pollutant discharge elimination system permits.

RESPONSE:

Request No. 29:

If the Company discharged any of its waste streams to the sewer at the Facility, provide copies of all permits and all analyses performed on discharged water, and identify all locations where waste streams were discharged.

RESPONSE:

Request No. 30:

For each waste stream generated at the Facility, describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream, including all industrial wastes and sludges generated from former clarifiers, sumps, and the vacuum distillation unit.

RESPONSE:

01 Filter – Chrome
Collected and stored in drums or cubic yard boxes for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by landfill

03 Used Oil and Water
Collected and stored in drums or holding tank for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by recycling

05 Paint Waste and Related Liquids
Collected and stored in drums for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by recycling

06 Paint Filters and Waste Solids
Collected and stored in cubic yard boxes for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by landfill and/or incineration

08 Sludge Chrome
Solidified and stored in drums or cubic yard boxes for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by treatment and/or landfill

09 Spent Solution – Chromic Acid
Collected and stored in drums or holding tank for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by tank treatment

10 Spent Solution – Anode Cleaner
Collected and stored in drums or holding tank for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by tank treatment

11 Spent Solution – Alkaline Waste
Collected and stored in drums or holding tank for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by tank treatment

13 Filters – Mixed
Collected and stored in drums or cubic yard boxes for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by incineration and/or landfill

14 Production Debris
Collected and stored in drums or holding tank for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by incineration and/or landfill

15 Spent Solution – Nickel Chromate
Collected and stored in drums or holding tank for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by tank treatment and/or recycle

16 Spent Solution – Wastewater Concentrate
Collected and stored in drums or holding tank for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by tank treatment and/or recycle

18 Filters – Cyanide
Collected and stored in drums or cubic yard boxes for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by tank treatment and or incineration

29 Spent Solution – Acid with Metals
Collected and stored in drums or holding tank for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by tank treatment and/or recycle

30 Spent Solution – Acid Sulfuric/Hydrofluoric
Collected and stored in drums or holding tanks for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by tank treatment and/or recycle

40 Spent Thinner and Naphtha
Collected and stored in drums for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by recycle

44 Cyanide Carbonate
Collected and stored in drums or cubic yard boxes for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by treatment, landfill and/or incineration

45 Cyanide Debris – Solids
Collected and stored in drums or cubic yard boxes for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by treatment, landfill and/or incineration

46 Spent Solution – Cyanide
Collected and stored in drums or holding tank for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by tank treatment and/or incineration

50 Solid – Sodium Hydroxide
Collected and stored in drums or cubic yard boxes for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by treatment and/or landfill

60 Hazardous Waste Solids – Chromium
Collected and stored in drums or cubic yard boxes for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by treatment and/or landfill

76 Spent Solution – Nickel
Collected and stored in drums or holding tank for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by tank treatment and/or recycle

78 Filters – Spray Booth
Collected and stored in drums of cubic yard boxes for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by landfill

80 Spent Aerosols
Collected and stored in drums or cubic yard boxes for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by recycle and/or incineration

81 Spent Solution – Sulfamatic Acid
Collected and stored in drums or holding tank for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by tank treatment and/or recycle

85 Universal Waste – Florescent Lamps
Collected and boxed for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by recycle

86 Universal Waste – Batteries
Collected and stored in drums or cubic yard boxes for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by recycle or landfill

87 Universal Waste – Ballasts
Collected and stored in drums or cubic yard boxes for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by recycle or landfill

88 Spent Solution – Ammonium Nitrate
Collected and stored in drums for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by tank treatment or landfill

89 Spent Aluminum Oxide Blast Media
Collected and stored in drums of cubic yard boxes for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by landfill or recycle

90 Spent Paints – Part A & Part B
Collected and stored in drums or cubic yard boxes for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by incineration and/or landfill

91 Spent E-Waste Computer Monitors
Collected and palletized for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by recycle

92 Spent Water Nickel/Chrome Mix
Collected and stored in drums for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by tank treatment and/or recycle

93 Spent Solvent Naphtha
Collected and stored in drums for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by recycle and/or incineration

94 Spent Grease
Collected and stored in drums for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by recycle and/or landfill

95 Empty Paint Cans
Collected and stored in drums of cubic yard boxes for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by recycle and/or landfill

96 Spent Mercury Lamps
Collected and stored in drums or cubic yard boxes for disposal
Onsite treatment – none
Transported off site by licensed transporter
Disposed of by recycle

00 Plating shop rinse waters
Onsite treatment processed through a vacuum distillation system for reuse. By products are collected in drums or holding tanks for disposal.
Transported off site by licensed transporter
Disposed of by tank treatment and/or recycle

Request No. 31:

Please provide a detailed description of all pre-treatment procedures performed by the Company on its waste streams at the Facility prior to transport to a disposal site.

RESPONSE: The only waste stream that is processed on site is the plating shop rinse water. This waste stream is pumped from the rinse tanks into a holding tank where, if required, it will be ph adjusted prior to being processed through the vacuum distillation system. The recoverable product will be stored in a holding tank for reuse. The unusable material will be pumped into a holding tank for disposal.

Request No. 32:

Please describe a detailed description of all pre-treatment procedures performed by the Company on its waste streams at the Facility prior to transport to a disposal site.

RESPONSE: Hawker does not have waste streams discharging to sumps. In the event of a spill in the plating area, Hawker utilizes a number of different methods to remove materials which may collect in the floor sump, including pneumatic operated pumps, vacuum systems as well as outside services to clean sumps.

Request No. 33:

Please identify all wastes that were stored at the Facility prior to shipment for disposal. Describe the storage procedures for each waste that was stored prior to disposal.

RESPONSE:

01 Filter – Chrome
Collected and stored in drums of cubic yard boxes for disposal

03 Used Oil and Water
Collected and stored in drums or holding tank for disposal

05 Paint Waste and Related Liquids
Collected and stored in drums for disposal

06 Paint Filters and Waste Solids
Collected and stored in cubic yard boxes for disposal

08 Sludge Chrome
Solidified and stored in drums or cubic yard boxes for disposal

09 Spent Solution – Chromic Acid
Collected and stored in drums of holding tank for disposal

10 Spent Solution – Anode Cleaner
Collected and store in drums or holding tank for disposal

11 Spent Solution – Alkaline Waste
Collected and stored in drums or holding tank for disposal

13 Filters – Mixed
Collected and stored in drums or cubic yard boxes for disposal

14 Production Debris
Collected and stored in drums or cubic yard boxes for disposal

15 Spent Solution – Nickel Chromate
Collected and stored in drums or holding tank for disposal

16 Spent Solution – Wastewater Concentrate
Collected and stored in drums or holding tank for disposal

18 Filters – Cyanide
Collected and stored in drums or cubic yard boxes for disposal

29 Spent Solution – Acid With Metals
Collected and stored in drums or holding tank for disposal

30 Spent Solution – Acid Sulfuric/Hydrofluoric
Collected and stored in drums or holding tank for disposal

40 Spent Thinner and Naphtha
Collected and stored in drums for disposal

44 Cyanide Carbonate
Collected and stored in drums or cubic yard boxes for disposal

45 Cyanide Debris – Solids
Collected and stored in drums or cubic yard boxes for disposal

46 Spent Solution – Cyanide
Collected and stored in drums or holding tanks for disposal

50 Solid – Sodium Hydroxide
Collected and stored in drums or cubic yard boxes for disposal

60 Hazardous Waste Solids – Chromium
Collected and stored in drums or cubic yard boxes for disposal

76 Spent Solution – Nickel
Collected and stored in drums or holding tanks for disposal

78 Filters – Spray Booth
Collected and stored in drums or cubic yard boxes for disposal

80 Spent Aerosols
Collected and stored in drums of cubic yard boxes for disposal

81 Spent Solution – Sulfamatic Acid
Collected and stored in drums or holding tank for disposal

85 Universal Waste – Florescent Lamps
Collected and boxed for disposal

86 Universal Waste – Batteries
Collected and stored in drums or cubic yard boxes for disposal

87 Universal Waste – Ballasts
Collected and stored in drums or cubic yard boxes for disposal

88 Spent Solution – Ammonium Nitrate
Collected and Stored in Drums for Disposal

89 Spent Aluminum Oxide Blast Media
Collected and stored in drums or cubic yard boxes for disposal

90 Spent Paints – Part A & Part B
Collected and stored in drums or cubic yard boxes for disposal

91 Spent E-Waste Computer Monitors
Collected and palletized for disposal

92 Spent Water Nickel/Chrome Mix
Collected and stored in drums for disposal

93 Spent Solvent Naphtha
Collected and stored in drums for disposal

94 Spent Grease
Collected and stored in drums for disposal

95 Empty Paint Cans
Collected and stored in drums or cubic yard boxes for disposal

96 Spent Mercury Lamps
Collected and stored in drums or cubic yard boxes for disposal

00 Plating shop rinse waters
Collected in drums or holding tanks for disposal

Request No. 34:

Please identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Facility. In addition, identify and provide supporting documentation of:

a. The date each release occurred;
b. The cause of each release;
c. The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
d. Where each release occurred and what areas were impacted by the release; and
e. Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.

RESPONSE:

Request No. 35:

Documentation obtained by EPA indicates that the Company has received several Notices of Violation relating to its discharge of industrial wastes, including spills from its plating operations and exceedances of standards for heavy metals. Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of hazardous substances at the Facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.

RESPONSE:

Request No. 36:

Information obtained by EPA indicates that in February of 1987, the Company purchased substantially all of the assets of a previous operator at the site, Flight Accessory Services, Inc. Provide copies of any and all documents evidencing that purchase transaction including, but not

limited to, the purchase agreement, all exhibits and attachments thereto, the security agreement, the promissory note, and any and all other financing documents.

RESPONSE:

Request No. 37:

Explain the difference between the types of operations being conducted at 11240 Sherman Way, Sun Valley, California (the parcel adjacent to the Facility which serves as the Company's corporate address) and the types of operations being conducted at the Facility itself.

RESPONSE:

11310 Sherman Way Building # 1 Current Operations at this address
Machine and grind operations

11310 Sherman Way Building # 2 Current Operations at this address
Plating, heat treating, tooling fabrication and inspection

11310 Sherman Way Building # 3 Current Operations at this address
Parts storage, parts and assemblies awaiting shipment

11260 ½ Sherman Way Building # 5 Current Operations at this address
Inspection operations - non-destructive testing, magna flux
Document control library – blueprint storage
Engineering, planning and inspection
Parts cleaning – steam cleaning
Paint removal – abrasive blasting
Abrasive blasting
Shot peen

11258 Sherman Way Building # 4 Current Operations at this address
Disassembly – teardown
Small part paint removal – abrasive blasting

11260 ½ Sherman Way Building # 5 Current Operations at this address
Abrasive cleaning
Steam cleaning operations
Shot peen operations
Engineering and planning
Document control
Non-Destructive testing – NDT – Mag & Pen

11260 Sherman Way Building # 6 Current Operations at this address
Facility maintenance workshop
Hazardous material storage
Bushing installation operations
Hand finishing, De-Burr operations

11252 Sherman Way Building # 7 Current Operations at this address
Hydraulic & components test, disassembly and assembly operations
Non-Destructive testing – NDT – Mag & Pen
Abrasive cleaning

11240 Sherman Way Building # 8 Current Operations at this address
Landing gear test, disassembly and assembly operations
Corporate offices
Shipping & receiving
Stockroom and warehouse operations
Paint operations

Dated: May 8, 2006

HAWKER PACIFIC AEROSPACE

By: _____
One of its attorneys

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